

Application No. 09/680,118
Amendment "C" dated January 6, 2004
Reply to Office Action mailed October 6, 2003

REMARKS

The latest Office Action, dated October 6, 2003, considered claims 1-25 and rejected claims 1-6 and 9-25 under 35 U.S.C. §103(a), as being unpatentable over Bredenberg (U.S. Patent No. 5,826,253) in view of Beizer et al. (U.S. Patent No. 6,240,414). Claims 7 and 8 were also rejected under 35 U.S.C. §103(a), as being unpatentable over Bredenberg in view of Beizer and in further view of applicants admitted prior art (page 3, ll. 8-12, 17-20).

By this paper claims 1-6, 17-21, and 25 have been amended.¹ Of these claims, the only independent claims at issue are claims 1, 17, 19 and 25.

As reflected above, in the listing of claims, claim 1 is directed to a method for altering a high-level document command including, receiving a single high-level document command meeting certain criteria, the single high-level document command including one or more operations, prior to implementing the single high-level document command, identifying one or more client applications that are to be notified of the receipt of only high-level document commands meeting certain criteria, prior to implementing the single high-level document command, an act of notifying the one or more identified client applications that the single high-level document command meeting the certain criteria has been received, notification of the one or more client applications being triggered solely as a result of receiving the single high-level document command, receiving modifying instructions from the one or more client applications on how to affect the implementation of the single high-level document command, and altering the one or more operations included in the single high-level document command according to the

¹ Although the prior art status of Bredenberg and Beizer is not being challenged at this time, Applicants reserve the right to challenge the purported prior art status of Bredenberg and Beizer at any appropriate time, should it arise. Accordingly, any arguments made herein with regard to Bredenberg and Beizer are only made assuming, *arguendo*, that Bredenberg and Beizer are actual prior art references and should not, therefore, be construed as acquiescing to any prior art status of the cited references.

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modifying instructions such that implementation of the single high-level document command is changed even when the single high-level document command is not in conflict with other high-level document commands.

Bredenberg, on the other hand, discloses a notification system for notifying clients of changes to data records after the changes to the data records have already occurred. Accordingly, the Examiner has appropriately acknowledged that Bredenberg does not teach each of the limitations recited in claim 1. (see p. 3 and 4 of the Office Action).

Beizer also fails to anticipate or obviate the claimed invention, even when viewed in combination with Bredenberg, for at least the following reasons. Beizer is generally directed to a conflict resolution system for resolving conflicting updates to shared data. More specifically, Beizer discloses the detection of a plurality of conflicting updates and notifying at least one corresponding user (or a third party) that a conflict has been detected (Beizer, Col. 5, ll. 13-31, Col. 6, ln. 62 – Col. 7, ln. 22). In other words, for a conflict between updates to be detected in Beizer, it is necessary for there to be at least two updates that are in conflict.

Accordingly, with regard to the combined teachings of Beizer and Bredenberg, notifications are only sent when two conditions are met: 1) receiving an update and 2) detecting that the update conflicts with another update, which is contrasted with the presently claimed invention. Therefore, inasmuch as Beizer and Bredenberg are limited to teaching the transmission of notifications only upon satisfying the two specific conditions mentioned above, the references, when considered alone or in combination, specifically fail, to disclose or suggest the act of "notifying the one or more identified client applications that the single high-level document command meeting the certain criteria has been received," when the notification is

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triggered "solely as a result of receiving a single high-level document command," as recited in claim 1.

Furthermore, Beizer also discloses that in response to a conflict notification, the notified parties can cooperate to resolve the conflict or that conflicts can be resolved according to a pre-defined set of rules. (Col. 5, ll. 21-36). In particular, conflict resolution involves selecting one of the conflicting updates to persist. For example, when a plurality of submitted values for a data field conflict, a user may be notified to select one of the values from among the plurality of conflicting values. (Beizer, Col. 7, ll. 3-4). Alternatively, unattended selection of one the values can also occur (Beizer, Col. 14, ll. 39-65). In this regard, therefore, Beizer fails to disclose that a value included with the update is altered before the update is selected to persist.

To reject a claim under 35 U.S.C. §103, the cited art must teach or suggest all of the disclosed claim limitations. Accordingly, Bredenberg and Beizer fail to obviate claim 1 for at least failing to teach or suggest a method for allowing client applications to control how a particular high-level document command is implemented, wherein a single high-level document command meeting certain criteria is received, prior to implementing the single high-level command identifying one or more client applications that are to be notified, prior to implementing the single high-level command notifying the one or more clients solely as a result of receiving the high-level document command, receiving modifying instructions from the one or more client applications, and altering one or more operations included in the high-level document command according to the modifying instructions, as recited in claim 1. The cited art also fails to anticipate claim 1 for at least the same reasons.

Although the foregoing remarks have been directed to claim 1, they also apply to the other independent claims (17, 19 and 25) at issue, and therefore, to all of the corresponding

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dependent claims. In particular, with regard to claim 17, the cited art fails to teach or suggest "receiving a single high-level document command meeting certain criteria" and "notifying the one or more identified client applications that a high-level document command meeting the certain criteria has been received prior to implementing the single high-level document command and solely in response to receiving the single high-level document command," as discussed above with regard to claim , particularly when viewed in combination with the other recited limitations of claim 17.

Claim 19 also includes the same elements recited above in claim 1, inasmuch as claim 19 is directed to a computer-program product for implementing the method recited in claim 1. Thus, the cited art fails to teach or suggest the limitations of claim 19 at least for the reasons provided with respect to claim 1.

With regard to claim 25, the cited art fails to teach or suggest "a notification component that is configured to send a notification . . . notification being triggered solely as a result of receiving the single high-level document command" and "a database engine configured to alter one or more operations included in the single high-level document according to received instructions when implementing the single high-level document command," for at least the reasons cited above with regard to claim 1 and when viewed in combination with the other limitations of claim 25.


For at least the forgoing reasons, Applicant respectfully submits that the pending claims, 1-25 are now in condition for allowance. In the event that the Examiner finds remaining

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impediment to a prompt allowance of this application that may be clarified through a telephone interview, the Examiner is requested to contact the undersigned attorney.

Dated this 6th day of January 2004.

Respectfully submitted,



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